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12	UNITED STATES DISTRICT COURT	
13	DISTRICT OF NEVADA	
14	KELLY RADKOWSKI,	Case No. 2:24-cv-02283-JCM-MDC
15	Plaintiff,	
16	vs.	STIPULATION AND ORDER TO EXTEND DEADLINE TO RESPOND
17	EQUIFAX INFORMATION SERVICES LLC; EXPERIAN INFORMATION	
18	SOLUTIONS, INC.; CLARITY SERVICES, INC.; AMERICAN	
19	EXPRESS, INC.; and CLARK COUNTY CREDIT UNION,	
20	Defendants.	
21		
22	Plaintiff Kelly Radkowski	and American Express National Bank,
23	erroneously sued as American Express,	Inc. ("American Express"), stipulate that
24		

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the deadline for American Express to respond to the complaint (ECF No. 1) be 1 extended for 30 days from January 8, 2025 until February 7, 2025. 2 3 This is the first extension sought in connection with this deadline and is requested to permit the parties time to investigate the allegations and assess the 4 5 possibility of settlement. FREEDOM LAW FIRM, LLC KAEMPFER CROWELL 6 7 /s/ George Haines George Haines, No. 9411 Robert McCoy, No. 9121 8 Gerardo Avalos, No. 15171 Sihomara L. Graves, No. 13239 8985 S. Eastern Avenue, Suite 100 1980 Festival Plaza Drive, Suite 650 Las Vegas, Nevada 89123 Las Vegas, Nevada 89135 10 Attorneys for Plaintiff STEPTOE LLP Kelly Radkowski Stephen J. Newman (PHV forthcoming) 11 Alice Kwak (PHV forthcoming) 2029 Century Park East, Suite 980 12 Los Angeles, California 90067 13 Attorneys for Defendant American **Express National Bank** 14 15 **ORDER** 16 17 IT IS SO ORDERED. 18 United States Magistrate Judge 19 DATED: 1-3-25 20 21 22 23 24

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